

**STEFAN /GEORGE
ASSOCIATES**

June 4, 2002

Superintendent Bill Douros
Monterey Bay National Marine Sanctuary
299 Foam Street
Monterey, California 93940

Chair Stephanie Harlan and
Members of the Sanctuary Advisory Council
299 Foam Street
Monterey, California 93940

Dear Superintendent Douros, Chair Harlan and Members:

The cruise lines that plan to visit Monterey Bay have reviewed the Recommendations Regarding Cruise Ships in Monterey Bay sent to you on March 12 by Kaitilin Gaffney, Co-Chair of the Conservation Working Group. As you know, each of the cruise lines planning to visit Monterey Bay this year have already agreed to a no-discharge policy in writing, and to provide the Water Resources Control Board with additional log information to document that no discharges occurred while in the Bay or Sanctuary. As a result, we believe that many of the Conservation Working Group's requests are unnecessary.

Taking the issues one by one:

1. Ballast water discharge is a non-issue, since there is no need for vessels to deballast in either Monterey Bay National Marine Sanctuary or in Monterey Bay.
2. Those cruise ships calling on Monterey Bay have ample capacity to hold wastewater and observe zero discharge policies in the MBNMS, and have agreed to do so in meetings with MBNMS and State and local officials, and in writing.
3. Cruise lines are already observing zero discharge of wastewater in California waters, and provide documentation of the zero discharge through quarterly reports sent to the state pursuant to state law.
4. EPA is currently evaluating a study of the potential impacts of greywater discharges from ships while underway, and operating offshore.

5. Preliminary results indicate that there are no detectable concentrations of pollutants other than bacteria, and the metals are not in excess of ambient conditions. The impact of nutrients and bacteria in seawater three miles offshore is likely to be negligible, and may not be detectable within a short distance of the ship.
6. All cruise lines visiting MBNMS adhere to the International Council of Cruise Lines (ICCL) Cruise Industry Waste Management Practices and Procedures (see www.iccl.org). In addition, ICCL members are regulated by federal laws enforced by the U.S. Coast Guard, as well as state laws while within state territorial waters and ports. These laws are more than adequate and, as noted, have resulted in notices of violation, a majority of which result from self-reporting, indicating that the industry strictly adheres to these laws and participates in their enforcement.
7. Any local water quality monitoring must include baseline ambient water quality information. Vessels can observe zero discharge, but if the water is contaminated by other sources, ships would wrongfully be accused of causing the problem.
8. Other requests already discussed with the Sanctuary and City of Monterey have been agreed to by those lines visiting Monterey Bay, including staying in the traffic lanes, safe operation of tenders, and anchoring location.

We have appreciated the opportunity to work with the MBNMS and the City of Monterey, along with other federal, state and regional agencies that regulate cruise ships in California territorial waters. We trust that the commitment by the visiting companies to observe zero discharge while in the Bay and Sanctuary should allay many of the original concerns regarding these visits. If you have any further questions, please contact me at (916) 443-5301 or sglobby@pacbell.net.

Sincerely,

Sande George

Sande George
Representing Crystal Cruises
Princess Cruises
and Royal Caribbean International